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Preliminary Amendment RCE

Filed On: October 18, 2001

### Remarks

Claims 21-33 and 41-79 are pending in the present patent application. Claims 1-20 and 34-40 have been canceled without prejudice, and preserving the right to continue prosecution of the cancelled claims. Independent Claims 21 and 41 have been amended to further clarify the claimed invention. Dependent Claims 22-25 and 27-33 have been amended only to maintain antecedent basis with Claim 21. Claims 51-79 have been added to claim subject matter described in Applicant's specification. No new matter has been added. Reconsideration of the pending Claims and allowance is respectfully requested in view of the following comments.

### The 35 U.S.C. 102(e) Claim Rejections

In the office action mailed April 26, 2005, Claims 1-6, 8-25 and 27-40 were rejected pursuant to 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,430,624 to Jamtgaard et al. (hereinafter "Jamtgaard"). Claims 1-6, 8-20 and 34-40 have been canceled and these rejections are moot. Applicant respectfully traverses the rejections of Claims 21-25 and 27-33 because Jamtgaard fails to teach each and every limitation of the amended Claims.

### Claims 21-25 and 27-33

Amended Claim 21 describes a method that includes selectively limiting the data structure of a first document object model document with a Message class and a Field class during a translation. In addition, the method of amended Claim 21 describes, while the data is read in, selectively limiting the data structure of a second document object model document with the Message class and the Field class. Jamtgaard fails to teach selectively limiting the data structure of a first document object model document during translation, and while the data is read in, selectively limiting the data structure of a second document object model as described in Claim 21. In sharp contrast, the entire scope and purpose taught by Jamtgaard is to represent content of an entire web page with a tree structure, (Col. 5 lines 54-67, Col. 6 lines 1-9 and Col. 10 lines 48-56) not limit the data structure of a document object model during translation and while data is read in

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as described in Claim 21. In addition, since Jamtgaard does not teach limiting a data structure during translation or while data is read in, Jamtgaard could not possibly teach limiting the data structure of the first document object model document and the second document object model document with a Message class and a Field class as further described in Claim 21. Jamtgaard also does not teach translation of a request to a first document object model document and reading data into a second document object model as described in Claim 21. Conversely, Jamtgaard teaches only a single document object model related to a response. Further, since Jamtgaard does not teach first and second document object model documents, Jamtgaard also does not teach an ApiService class that translates a request to, and reads data into, the respective first and the second document object model documents as also described in Claim 21.

The final office action mailed April 26, 2005 included a discussion of gateways. Applicant agrees that a gateway performs protocol conversions. However, each gateway must be pre-programmed so that the gateway will know how to convert whatever information the gateway receives. In other words, to successfully perform protocol conversions, the information received by the gateway must be pre-defined within the gateway. Clearly, if a gateway is provided information that it does not know what to do with, the gateway could crash or generate an error message. Thus, developers must be keenly aware of the content of all messages to ensure compatibility with the translation capability of a gateway.

As described on pages 2 -3 and 13 of Applicant's specification, software developer's may enjoy simplified development of custom application code since they can rely on the present invention to provide a generic translation mechanism that allows communication between any of a plurality of delivery technologies and a back-end systems layer. By limiting the data structure of the messages passing there between, with the Message and Field classes, the messages may be readily translated to a structure that is compatible with a particular delivery technology and a particular back-end system without regard to the data structure of each of the delivery technology and the back-end system layer require to successfully process the messages. In addition, messages from any of the plurality of delivery technologies may be translated in a limited fashion to

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standardized content to make the request substantially the same without regard to whether the request was generated by a personal computer or a cell phone. Accordingly, the software developer no longer must be concerned with providing separate presentation and interfacing technology for requests and responses that may need to look very different depending on the delivery technology and/or backend system handling the messages.

Jamtgaard also fails to teach or disclose setting a plurality of text nodes within the first document object model to a unit of data identified by a tag in the request as described in Claim 22. In addition, limiting the unit of data to a predetermined datatype as described in Claim 23 or limiting the predetermined datatype to a string as described in Claim 24 is not taught or suggested by Jamtgaard. Setting an attribute noted to an attribute identified by a request name parameter in the request as provided in Claim 25 is also not taught or suggested by Jamtgaard. Jamtgaard also does not teach setting, based on a datatype, a plurality of text nodes within a second document object model document to data read in to the second document object model document as described in Claim 29, or setting, as a function of a datatype, an attribute node within the second document object model document to an attribute read in to the second document object model document as described in Claim 30. Limiting an attribute value to a predetermined datatype as described in Claim 31 is also not taught by Jamtgaard.

For at least the foregoing reasons, Jamtgaard does not explicitly or inherently teach each and every limitation described in Claims 21-25 and 27-33. Applicant therefore respectfully requests withdrawal of the 35 U.S.C. 102(e) rejections of Claims 21-25 and 27-33.

#### **The 35 U.S.C. 103(a) Claim Rejections**

Claims 7 and 26 stand rejected pursuant to 35 U.S.C. §103(a) as being obvious in view of Jamtgaard and further in view of *Take and in-depth look at the Java Reflection API*, Chuck McManis, Java World, p. 1-11, September 1997 (hereinafter "McManis"). In addition, Claims 41-50 stand rejected pursuant to 35 U.S.C. §103(a) as being obvious in view of the combination of

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Jamtgaard and *Java Examples in a Nutshell: A tutorial Companion to Java in a Nutshell*, David Flanagan, p. 20-26 O'Reilly & Associates, Inc. 1997 (hereinafter "Flanagan").

#### Claims 41-50

Claim 41 describes a Message class and a Field class operable to restrict manipulation of a document object model document. Applicant agrees with the definition of a wrapper as defined on page 575 of Microsoft Computer Dictionary fifth edition (2002), and as also defined on page 12 lines 8-9 of Applicant's specification. In addition, Applicant readily agrees that Flanagan is describing a class representing complex numbers. However, what both Jamtgaard and Flanagan fail to teach, suggest, or disclose is restriction of manipulation of a document object model document as provided in Claim 41. As described on at least page 13 lines 4-15 of Applicant's specification, restriction of manipulation reduces coding complexity and streamlines processing for input and output messages. Flanagan, on the other hand, teaches encapsulation by declaring individual fields within a class private to make them inaccessible from outside the class, and defines methods within the class to access the information in the identified fields. Clearly, Flanagan does not teach, suggest, or disclose restriction of manipulation of a document object model document as described in Claim 41, but rather teaches designating fields (or data values) in a class as restricted. A class is not a document object model document and designation of fields in a class as "private" is wholly different than restricting manipulation of an entire document object model document. In addition, Applicant respectfully asserts that hiding implementation details as taught by Flanagan allows implementations to be changed without affecting users, but has nothing to do with restricting manipulation of a document object model document as described in Claim 41.

Applicant also respectfully traverses that "use of" Jamtgaard's DOM illustrated in Fig. 3 teaches, suggests or discloses a message class that is operable as a wrapper of a document class, a document object model element class and a processing instructions class as described in Claim 48.

To the contrary, neither Flanagan nor Jamtgaard even mention the contents of a DOM class and

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therefore cannot possible teach, suggest or disclose any form of a wrapper of the document class, the document object model element class and the processing instructions class included in the DOM class. A field class operable as a wrapper of a document object model setattribute method as described in Claim 49 is also not taught, suggested or disclosed by "use of" Jamtgaard's DOM as asserted in the office action. Clearly, neither Flanagan nor Jamtgaard's DOM make any mention of wrappers of the contents of a DOM class at all. A subclass of custom application code responsive to a request as described in Claim 50 is also not taught, suggested, or disclosed by either Jamtgaard or Flanagan as asserted in the office action. In the office action, it was asserted that Flanagan taught such a subclass. Applicant respectfully asserts that the use of subclasses is well known and that simple use of the term "subclass" does not teach, suggest, or disclose a subclass of custom application code responsive to a request as described in Claim 50.

In addition, Applicant also respectfully asserts that neither Jamtgaard nor Flanagan teach, suggest or disclose a Fldtypes class as described in Claim 45. In the office action mailed April 25, 2005 it was asserted that Jamtgaard taught a Fldtypes class in Col. 14 lines 50-60. However, in the cited portion of Jamtgaard, a discussion of the parameters of a display screen are discussed for sizing a presentation to be sent for display on a wireless device. Clearly, display screen parameters of a wireless device are not definitions of datatypes for fields within an input message as described in Claim 45. In addition, a plurality of field names selectable with a mode debug flag as describe in Claim 46 is clearly not taught, suggested or disclosed by Jamtgaard's DOM illustrated in Fig. 3 as asserted in the office action. In the office action, it was further asserted that Col. 12 lines 53-63 of Jamtgaard teach a messagedefinition class that define a first field name and a second field name as described in Claim 47. Col. 12 lines 53-63 of Jamtgaard describe RML code that represents translation of a web page (Col. 11 lines 46-48 and Col. 12 lines 30-31). Translation of a web page to RML code is entirely different than a messagedefinition class operable within a server computer to define a first field name and a second field name as described in Claim 47.

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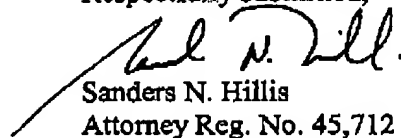
Claims 7 and 26

Claim 7 has been cancelled and this rejection is now moot. With regard to Claim 26, Applicant has searched the cited portions of McManis and can find no reference to a mode debug flag nor selection of one of a short field name and a long field name for each of a plurality of fields in a document object model document. To the contrary, McManis simply teaches a method of returning a "shorthand name" that is stored in a hash table. Clearly, a method that processes a name and returns a shorthand name is entirely different from selecting one of a short field name and a long field name for each of a plurality of fields in a document object model document as a function of a mode debug flag as described in Claim 26.

For at least the previously discussed reasons, all of the claim features described by Claims 26 and 41-50 are not taught or suggested by the cited combination of the prior art. Thus, a *prima facie* case of obviousness has not been established. Applicant respectfully requests withdrawal of the 35 U.S.C. §103(a) rejection of Claims 26 and 41-50.

In view of the amendments to the Claims and the above discussion, the application is believed to now be in condition for allowance, which is respectfully requested. Should the Examiner deem a telephone conference to be beneficial in expediting examination and/or allowance of this application, the Examiner is invited to call the undersigned attorney at the telephone number listed below.

Respectfully submitted,

  
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